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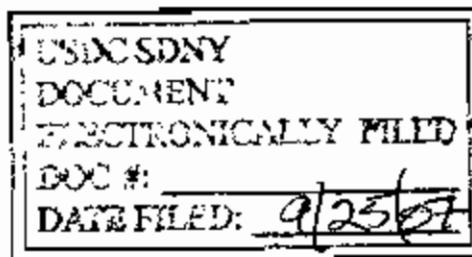
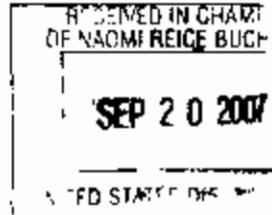
September 20, 2007

Our ref: 297-06/ROSS

\*ALSO ADMITTED IN NEW JERSEY  
\*\*ALSO ADMITTED IN CONNECTICUT  
\*\*\*ALSO ADMITTED IN WASHINGTON, D.C.  
\*\*\*\*ALSO ADMITTED IN LOUISIANA

VIA FAX NO: 212 805 7927

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, Suite 2270  
New York, New York 10007



RE: Uniwire Trading LLC v. M/V Wladyslaw Orkan, et al.  
07 CV 3427 (NRB)

Dear Judge Buchwald:

We represent the Defendants in the captioned litigation. Recently, the Court granted us telephonic permission to file a Motion to Dismiss on the basis of a foreign forum selection clause contained in the ocean bill of lading contract of carriage. In conjunction with this Motion, we will need evidence from a Polish attorney in support of the Motion.

After conferring with counsel for Plaintiff, we agreed to propose the following briefing schedule for your consideration:

October 18, 2007.....Motion to be filed;  
November 9, 2007.....Opposition papers are due; and  
November 23, 2007 ... Reply to the Opposition papers are due.

So Ordered.  
*Naomi Reice Buchwald*  
9/24/07

Under the circumstances, we respectfully ask that the Court adopt the aforementioned proposed briefing schedule and thank you in advance for your anticipated cooperation.

Respectfully submitted,  
FREEHILL HOGAN & MAHAR, LLP



ROSS:lu

James L. Ross

cc: Nicoletti Hornig & Sweeney  
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